

REPORTS ANALYSIS REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 4, 2009

ANALYST: Christopher Morse

I. COMMITTEE: DNC Services Corporation/Democratic National
Committee
C00010603
Andrew Tobias, Treasurer
430 S. Capitol Street, SE
Washington, DC 20003

TYPE OF COMMITTEE: Party

II. REGISTRATION: July 29, 1976

III. BACKGROUND:

The Committee was sent twenty-four (24) Requests for Additional Information (RFAs) which included reporting errors involving failure to provide supporting schedules, failure to properly itemize disbursements and failure to clarify public communication expenses and possible candidate fundraising expenses.

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VIOLATION DESCRIPTION	REPORT(S)	DETAILS OF VIOLATION
Prohibited Contributions and Other Impermissible Contributions and Transfers	2008 Amended 12G, received 4/13/09	Schedule B of the Committee's report disclosed a contribution totaling \$5,000.00 which was designated for the 2008 Primary Election but dated after the state primary.
Mathematical Discrepancies	2008 M10	The Committee's report contained mathematical discrepancies totaling \$21,222.38
Mathematical Discrepancies	2008 YE	The Committee's report contained mathematical discrepancies totaling \$190,924.08
Failure to Provide Supporting Schedules	2008 Amended 30G, received 4/13/09	The Committee's amended report failed to include all of the activity previously disclosed on Schedules B and H4, resulting in a missing schedule of \$20,007.20.
Failure to Provide Supporting Schedules	2008 YE	Schedule A supporting Line 12 of the Committee's report(s) disclosed \$69,161.51 in transfers received from a joint fundraiser. However, the supporting itemized memo entries provided on Schedule A totaled \$47,531.26, creating a discrepancy of \$21,630.25.
Federal Election Activity/Levin Funds	2008 Amended 30G, received 4/13/09	On Schedule B, the Committee disclosed \$16,441.91 in disbursements made for "GOTV mail," "GOTV phone bank," "GOTV postcards," and "Phone Bank/Doorbelling" but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates.
Allocated Federal and Non-Federal Activity	2007 M2	The Committee failed to provide the name and address of the original vendors for credit card payments to one (1) vendor totaling \$5,445.43.
Allocated Federal and Non-Federal Activity	2008 Amended M9, received 12/5/08	On Schedule H2, the Committee disclosed the ratio as being the same as previously reported for one (1) fundraising event; however, this event was not previously reported.
Allocated Federal and Non-Federal Activity	2008 M10	The Committee failed to provide adequate purposes for disbursements to two (2) vendors totaling \$7,000.00.
Allocated Federal and Non-Federal Activity	2008 12G	<p>The Committee failed to provide an adequate purpose for disbursement to one (1) vendor totaling \$4,340.00.</p> <p>Schedule H4 disclosed \$3,087.98 in reimbursements to individuals for non-travel related expenses; however there were \$5,249.90 in MEMO entries disclosing the original vendors on Schedule H4, a \$2,161.92 discrepancy.</p>

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Allocated Federal and Non-Federal Activity	2008 Amended 12G, received 4/13/09	<p>On Schedule H4, the Committee disclosed \$8,250.00 in disbursements made for "Consulting GOTV," but failed to clarify whether the activity met the definition of Federal Election Activity. Further, the Committee failed to address an apparent impermissible transfer of \$5,940.00 from the non-federal account that occurred as a result of allocating these payments between the federal and non-federal accounts.</p> <p>The Committee failed to clarify whether the appropriate allocation ratio was used for payments totaling \$2,161.92 that are categorized on Schedule H4 as Administrative expenses with purposes indicating they are fundraising expenses.</p>
Allocated Federal and Non-Federal Activity	2008 30G	<p>The Committee failed to disclose on Schedule H4 a transfer to its non-federal account for the non-federal share of a refund or rebate of a previously allocated expense, totaling \$11,520.00.</p> <p>The Committee failed to clarify transfers made to an apparent non-federal account disclosed on Schedule B, totaling \$420.00.</p> <p>The Committee failed to provide an adequate purpose for disbursement to one (1) vendors, totaling \$6,000.00.</p> <p>Schedule H4 disclosed \$10,439.32 in reimbursements to individuals for non-travel related expenses; however there were \$8,986.10 in MEMO entries disclosing the original vendors on Schedule H4, a \$1,453.22 discrepancy.</p>
Allocated Federal and Non-Federal Activity	2008 Amended 30G, received 4/13/09	<p>On Schedule H4, the Committee disclosed \$18,294.00 in disbursements made for "Consultant GOTV" and "Consulting GOTV," but failed to clarify whether the activity met the definition of Federal Election Activity. Further, the Committee failed to address an apparent impermissible transfer of \$13,171.68 from the non-federal account that occurred as a result of allocating these payments between the federal and non-federal accounts.</p>

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